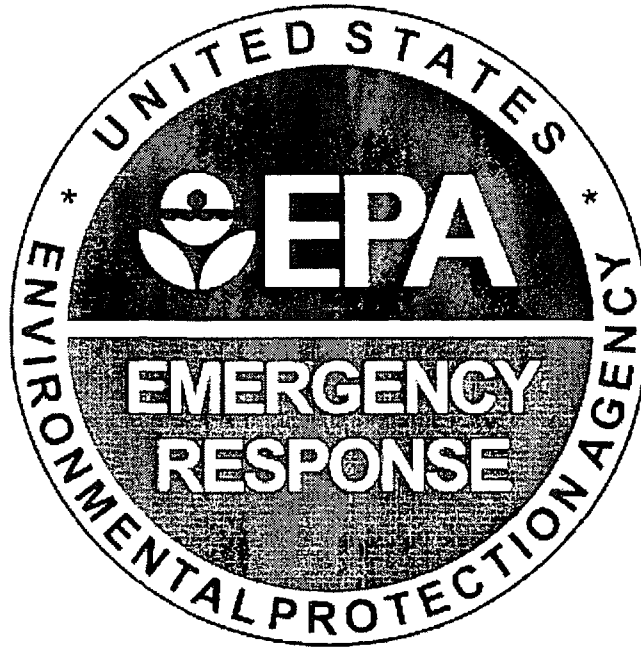


U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Cleveland Trencher - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Initial
Cleveland Trencher

Euclid, OH
Latitude: 41.5789440 Longitude: -81.5372930

To: Scott Shane, OEPA
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From: Stephen Wolfe, On-Scene Coordinator

Date: 9/7/2011

US EPA RECORDS CENTER REGION 5



412807

Reporting Period: 08/22/2011 through 09/02/2011

1. Introduction

1.1 Background

Site Number:	B5SJ	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/22/2011	Start Date:	8/22/2011
Demob Date:		Completion Date:	
CERCLIS ID:	OHN 000 510 393	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Potentially Responsible Party (PRP) lead Removal Action

1.1.2 Site Description

The CT Site encompasses approximately 14.5 acres of land and has approximately 140,000 square feet of buildings. Approximately 70,000 square feet of buildings have been demolished.

The Site is located in an industrial neighborhood. The Site is bordered to the north by St Clair Avenue and railroad tracks. Other industrial properties surround the Site on all sides.

1.1.2.1 Location

The CT Site is located at 20100 St Clair Avenue, Euclid, Cuyahoga County, Ohio 44117 and the geographical coordinates for the Site are: latitude 41° 34' 44" North and longitude 81° 32' 10" West.

1.1.2.2 Description of Threat

The Cleveland Division of Air Quality (CDAQ) stopped the property owner's from demolishing the site due to improper asbestos abatement. Friable asbestos is present in debris piles located throughout the site as well as inside the partially demolished building. In addition, over 120 drums of unknown materials, several tanks and transformers are present on the site. The property is fenced, however gaps in the fence allow unimpeded access to the site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

OEPA performed a site assessment at the site in March, 2009. Samples from the site assessment indicated the presence of D001 hazardous wastes (characteristic of ignitability [flashpoint less than 140 degrees Fahrenheit]), D008 (characteristic of Toxicity [lead TCLP values greater than 5 milligrams per liter]), presence of polychlorinated biphenyls in electrical transformers, the presence of uncontrolled ACM was documented by the CDAQ, and many of the drums were open or leaking

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The PRPs contractors mobilized to the site the week of August 15th to begin site preparation. Full mobilization began the week of August 22, 2011. Initial activities included: posting signage, mobilization of equipment, demarcation of work zones, putting plastic over windows, and consolidating the waste piles.

2.1.2 Response Actions to Date

August 23, 2011 (Tuesday)

- PRP contractor work activities included;
 - securing the perimeter of the Site (adding sections of chain-link fence to missing or damaged portions of the existing perimeter fence)
 - began installing plastic sheeting over the windows of the office building.
- PRP air monitoring firm began the collection of background air samples for asbestos.
- START conducted initial entry air monitoring with the MultiRae around the Site, observed PRP contractor's work activities and progress in accordance with the work plan.

□

Αυγуст 24, 2011 (Ωεδνεσδαψ)

- PRP contractor work activities included;
 - continued installing plastic sheeting over the windows of the office building.
- PRP air monitoring firm continued the collection of background air samples for asbestos.
- START conducted initial entry air monitoring with MultiRAE around the Site, observed PRP contractor's work activities and progress in accordance with the work plan.

□

Αυγуст 25, 2011 (Τηυρσδαψ)

- PRP contractor work activities included;
 - continued installing plastic sheeting over the windows of the office

building and installed plywood over access opening from the office building to the manufacturing area.

- PRP air monitoring firm continued the collection of background air samples for asbestos.
- START observed PRP contractor's work activities and progress in accordance with the work plan.

□

Αυγуст 26, 2011 (Φριδαυ)

- PRP contractor work activities included;
 - continued installing plastic sheeting over the windows of the office building
 - tested water truck and hose connections in preparation of the outside asbestos contaminated debris removal activity
 - began moving asbestos contaminated debris piles inside the Machine Shop area of the building. Debris being staged/stockpiled for subsequent loading for transportation and disposal.
- PRP air monitoring firm continued the collection of background air samples for asbestos.
- START observed PRP contractor's work activities and progress in accordance with the workplan.

August 29, 2011 (Monday)

- PRP Contractor continued moving asbestos contaminated debris piles inside the Machine Shop and Shipping & Receiving areas of the building. Asbestos contaminated debris being staged/stockpiled outside the building for subsequent loading for transportation and disposal.
- PRP Contractor began and completed the construction of the concrete truck decontamination pad. Wood forms and concrete were installed today.
- PRP air monitoring firm began the collection of perimeter and personnel air samples for asbestos removal activities.
- START observed PRP contractor's work activities and progress in accordance with the work plan.

□

Αυγуст 30, 2011 (Τυεσδαυ)

- PRP Contractor continued moving asbestos contaminated debris piles inside the Machine Shop, Shipping & Receiving and Assembly Department areas of the building. Asbestos contaminated debris being staged/stockpiled outside the building for subsequent loading for transportation and disposal.
- PRP air monitoring firm began the collection of perimeter and personnel air samples for asbestos removal activities.
- START observed PRP contractor's work activities and progress in accordance with the work plan.

□

Αυγуст 31, 2011 (Ωεδνεσδαψ)

- PRP contractor work activities included;
 - completed moving asbestos contaminated debris inside the Machine Shop, Shipping & Receiving and Assembly Department areas of the building.
 - Began consolidating asbestos contaminated debris piles outside the building for subsequent loading for transportation and disposal.
 - continued installing plastic sheeting over the windows of the office building.
 - continued the preparation of the truck decontamination pad
 - began and completed the assessment and inventory of the drums, containers and tanks for the supplies and equipment required to sample, repackage and consolidate contents for subsequent transportation and disposal.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities. Also conducted real-time air monitoring during the assessment of the drums and containers.
- START observed PRP contractor's work activities and progress in accordance with the work plan.
- A representative (Mike Samec) of the City of Cleveland Division of Air Quality on site for inspection.

□

Σεπτεμβερ 1, 2011 (Τηυρσδαψ)

- PRP contractor work activities included;
 - Continued consolidating asbestos contaminated debris piles outside the building for subsequent loading for transportation and disposal.
 - Completed installing plastic sheeting over the windows and doorways of the office building. The holes in the roof may need to be addressed, as per Ohio Department of Health.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.
- START observed PRP contractor's work activities and progress in accordance with the work plan.
- A representative from the Ohio Department of Health (Alan Richards) on site for inspection.

□

Σεπτεμβερ 2, 2011 (Φριδαψ)

- PRP contractor work activities included;
 - Continued consolidating asbestos contaminated debris piles outside the building for subsequent loading for transportation and disposal.
- PRP air monitoring firm continued the collection of background air

samples for asbestos.

- START observed PRP contractor's work activities and progress in accordance with the workplan.
- A representative from the City of Cleveland, Division of Air Quality (Mike Samec) on site for inspection.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Cleveland Trencher Site was referred to U.S. EPA in May, 2009. U.S. EPA identified the two potentially responsible parties (one for the asbestos portion of cleanup, one for the cleanup of drums and other containers) and issued General Notice Letters as well as a Unilateral Action Order. Agreements were reached and the PRPs mobilized their contractors on August 22, 2011 to begin removal actions.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Sample Drums as necessary
Transport and dispose of all waste at the site (asbestos, drums)
inspect tanks for material and render unusable
remove transformers from site
Clean pad used for drum storage

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Subcontract with another company for drum removal

2.2.2 Issues

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

US EPA contactor is tracking costs separately (asbestos oversight and drum oversight) in order to properly allocate the costs associated with the activities to the correct PRP.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$50,000.00	\$11,000.00	\$39,000.00	78.00%
Intramural Costs				
USEPA - Direct	\$25,000.00	\$2,000.00	\$23,000.00	92.00%
Total Site Costs	\$75,000.00	\$13,000.00	\$62,000.00	82.67%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

Daily safety meetings are held prior to the start of the work day.

Personnel air sampling for asbestos is being conducted

Wet techniques are being used for asbestos removal

The START oversight personnel is asbestos certified

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

4. Personnel On Site

PRP contractors

START (1)

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

6.2 Reporting Schedule

7. Situational Reference Materials